

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

RJ TECHNOLOGY LLC,
Patent Owner.

Case IPR2023-01350
Patent No. 7,749,641

**DECLARATION OF MICHAEL NG
IN SUPPORT OF PATENT OWNER'S
MOTION FOR *PRO HAC VICE* ADMISSION**

I, Michael Ng, being duly sworn and upon oath, hereby attest to the following:

1. I am a member of good standing with the State Bar of California (2005).

2. I am an attorney at Kobre & Kim LLP. I am an experienced patent litigation attorney with more than eighteen years of experience. In that time, I have served as counsel in numerous patent infringement suits before the U.S. District Courts for the Central District of California, Northern District of California, Eastern District of Texas, Eastern District of Virginia, Northern District of Illinois, and District of Delaware and am admitted to practice in the U.S. Supreme Court; the U.S. Court of Appeals for the Federal Circuit, Ninth Circuit, and Second Circuit; and the U.S. District Courts for the Central District of California, Eastern District of California, Eastern District of Texas, Northern District of California, Northern District of Illinois, Southern District of California and Southern District of New York.

3. I have never been suspended or disbarred from practice before any court or administrative body.

4. I have never had an application for admission to practice before any court or administrative body denied.

5. I have never had any sanctions or contempt citations imposed on

me from any court or administrative body.

6. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of title 37 of the Code of Federal Regulations.

7. I agree to be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et. seq.*, and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

8. I have applied to appear *pro hac vice* before the Board in the following matters within the last three years:

Cisco Systems, Inc. v. Orckit Corporation, IPR2023-00401

Cisco Systems, Inc. v. Orckit Corporation, IPR2023-00402

Cisco Systems, Inc. v. Orckit Corporation, IPR2023-00554

Cisco Systems, Inc. v. Orckit Corporation, IPR2023-00714

Additionally, I am concurrently applying to appear *pro hac vice* before the Board in the following matter:

Samsung Electronics Co., Ltd. v. RJ Technology LLC, IPR2023-01183

9. RJ Technology LLC's lead counsel in this proceeding, Mr. James T. Carmichael, is a Partner at Carmichael IP, PLLC, and is a registered practitioner experienced in proceedings before the USPTO.

10. I have worked with lead counsel and am familiar with the subject matter at issue in this proceeding. As such, I have reviewed and am very familiar

with (i) U.S. Patent No. 7,749,641 (the “’641 patent”), the patent-at- issue in this proceeding, (ii) the prior art relied upon in Petitioner’s Petition, (iii) the legal and factual arguments that have been addressed by Patent Owner, and (iv) the developments in this proceeding since the filing of Petitioner’s Petition. I am lead counsel for RJ Technology LLC in the related district court case *RJ Technology LLC v. Apple Inc.*, Case No. 8:22-cv-1874-JVS-JDE (CDCA) and counsel in the related district court case *RJ Technology LLC v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.*, Civil Action No. 2:22-cv-00401-JRG (EDTX) in which RJ Technology LLC has asserted the ’641 against Petitioner and other parties.

11. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements are made with knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both. (*See* 18 U.S.C. §1001.)

Dated: April 4, 2024

/s/Michael Ng
Michael Ng